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BY ECF

The Honorable Roslynn R. Mauskopf
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Josifidis v. Schneiderman, et al.
No. 16-cv-1944 (RRM) (RER)

Your Honor:

I am a member of Ateshoglu & Aiello, P.C. (hereinafter “AA”) attorneys for plaintiff Harry Josifidis in the above referenced action. I am writing in response to the Court’s order, dated January 5, 2017, directing the filing of a Joint Status Report. Counsel for the parties respectfully request an adjournment of the filing of the Joint Status Report for the reasons set forth below.

Please be advised, on January 1, 2017, the principals of AA merged their practice with McManus Adams & Apostolakos PLLC which changed its name to McManus Ateshoglu Adams Aiello & Apostolakos PLLC (hereinafter “MAAAA”).

Pursuant to the terms of the merger, in the weeks following the merger, AA and its principals were to cease representing plaintiffs in cases involving false arrest and malicious prosecution. We are notifying the Court at this late date, because as this case did not involve employees of the City of New York, we did not believe that our withdrawal as counsel would be required. However, upon further review, it was determined that our withdrawal from this case was indeed required as per the terms of our merger.

We have notified Plaintiff of the circumstances and we will assist him in retaining new counsel to represent him in this matter. Should Plaintiff be unable to retain new counsel to represent him in this action, this office will seek leave to withdraw as counsel and file a motion to withdraw pursuant to Local Civil Rule 1.4.

We have advised Defendants' counsel Linda Fang, Esq. of the relevant circumstances and she has consented to a stay of the proceedings through February 28, 2017, so that Plaintiff may retain new counsel. Accordingly, counsel for the parties respectfully request the Court to stay all proceedings, including submissions by Defendants, until February 28, 2017.

Thank you for your consideration.

Respectfully submitted,

/s/ Steven D. Ateshoglou

Steven D. Ateshoglou (SA 2908)

cc: Linda Fang, Esq. (By ECF)
Assistant Attorney General
Attorney for state Defendants